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8 *Attorneys for Plaintiffs*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 JOHN and JOANN DOE, parents and natural
12 guardians of JANE DOE, a minor,

13 Plaintiffs,

14 v.

15 CLARK COUNTY SCHOOL DISTRICT;
16 CLARK COUNTY EDUCATION
17 ASSOCIATION; DARRYL L. LANCASTER;
18 KEMALA WASHINGTON,

19 Defendants.
20

CASE NO 2:24-cv-00284-GMN-BNW

**NOTICE OF CORRECTED
STIPULATION TO EXTEND
BRIEFING SCHEDULE WITH
RESPECT TO DEFENDANT
CLARK COUNTY EDUCATION
ASSOCIATION'S MOTION FOR
JUDGMENT ON THE
PLEADINGS [ECF No. 38]
(First Request)**

21
22 Pursuant to Rule IA 6-1 of the Local Rules of Practice for the United States District
23 Court, District of Nevada, Plaintiffs, John and Joann Doe, parents and guardians of Jane Doe
24 ("Plaintiffs") and Defendants Clark County School District ("CCSD"); Clark County Education
25 Association ("CCEA"); Darryl L. Lancaster ("Mr. Lancaster") and Kemala Washington ("Ms.
26 Washington"), by and through their attorneys of record, hereby submit this Notice of Corrected
27 Stipulation to Extend the Briefing Schedule with respect to CCEA's Motion for Judgment on
28 the Pleadings [ECF No. 38], which was filed on January 17, 2025. The Corrected Stipulation is

1 attached hereto as Exhibit 1.

2 DATED THIS 24th day of January, 2025.

3 **CLOWARD TRIAL LAWYERS**

4 /s/ Riley A. Clayton

5 RILEY A. CLAYTON, ESQ.

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11 *Attorneys for Plaintiffs*



CERTIFICATE OF SERVICE

Pursuant to NEFCR 9, NRCP 5(b), LR IC 4-1, and/or FRCP 5(b), I hereby certify that on this 24th day of January, 2025, I caused to be served a true copy of the foregoing **NOTICE OF CORRECTED STIPULATION TO EXTEND BRIEFING SCHEDULE WITH RESPECT TO DEFENDANT CLARK COUNTY EDUCATION ASSOCIATION'S MOTION FOR JUDGMENT ON THE PLEADINGS [ECF No. 38] (First Request)** as follows:

☐ U.S. Mail—By depositing a true copy thereof in the U.S. mail, first class postage prepaid and addressed as listed below; and/or

☐ Hand Delivery—By hand-delivery to the addresses listed below; and/or

☐ Facsimile—By facsimile transmission; and/or

☒ Electronic Service — By electronic means upon all eligible electronic recipients via the PACER e-filing system and/or via email.

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/s/ *Cat Barnhill*

An employee of Cloward Trial Lawyers



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EXHIBIT “1”

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CASE NO 2:24-cv-00284-GMN-BNW

**STIPULATION TO EXTEND
BRIEFING SCHEDULE WITH
RESPECT TO DEFENDANT
CLARK COUNTY EDUCATION
ASSOCIATION'S MOTION FOR
JUDGMENT ON THE
PLEADINGS [ECF No. 38]
(First Request)**

21 Pursuant to Rule IA 6-1 of the Local Rules of Practice for the United States District
22 Court, District of Nevada, Plaintiffs, John and Joann Doe, parents and guardians of Jane Doe
23 ("Plaintiffs") and Defendants Clark County School District ("CCSD"); Clark County Education
24 Association ("CCEA"); Darryl L. Lancaster ("Mr. Lancaster") and Kemala Washington ("Ms.
25 Washington"), by and through their attorneys of record, stipulate and agree to extend the
26 briefing schedule with respect to CCEA's Motion for Judgment on the Pleadings [ECF No. 38],
27 which was filed on January 17, 2025, as follows:
28

1 1. CCEA filed its Motion for Judgment on the Pleadings [ECF No. 38] on Friday,
2 January 17, 2025.

3 2. The Motion for Judgment on the Pleadings seeks dismissal of each of Plaintiffs'
4 claims asserted against CCEA, i.e., Title IX; Civil Rights under Sec. 1983; Violations of NRS
5 Sec. 41.139655; Intentional Infliction of Emotional Distress; Negligence; Negligent Infliction of
6 Emotional Distress; and Negligent Hiring, Training, and Supervision.

7 3. The current deadline to respond to the Motion for Judgment on the Pleadings
8 (“MJOP”) is January 31, 2025.

9 4. When the MJOP was filed, Plaintiffs’ counsel was out of state conducting other
10 depositions in another case on January 21 and 22, 2025. Upon returning to Nevada, Plaintiffs’
11 counsel previously-scheduled day-long depositions in another case for January 23 and 24, 2025.
12 These previously scheduled depositions have effectively precluded Plaintiffs’ counsel from
13 commencing the preparation of Plaintiffs’ intended response to the MJOP for the first week of
14 the two-week response period.

15 5. Given the nature and complexity of the issues raised in the MJOP, coupled with
16 Plaintiffs’ counsel’s prior commitments in other cases that have precluded Plaintiffs from being
17 able to commence preparation of the intended Response, the parties agree that it is in the best
18 interests of all to extend the briefing schedule with respect to the MJOP.

19 6. The parties have agreed to provide Plaintiffs with an extension until February 21,
20 2025, to provide their Response.

21 7. The parties have also agreed to allow CCEA to file its Reply brief on before
22 March 7, 2025.

23 8. This is the parties’ first request for an extension of the briefing with respect to
24 the Motion for Judgment on the Pleadings [ECF No. 38]. The parties also affirm that this
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extension is not made with an improper purpose but is made in good faith in light of the present circumstances and the issues presented in the MJOP.

Dated this 23rd of January, 2025.

Dated this 23rd of January, 2025

Cloward Trial Lawyers

Snell & Wilmer

/s/ Riley A. Clayton

/s/ John Delikanakis

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Attorneys for Defendant, CCEA

Dated this 23rd of January, 2025

---and---

Law Offices of Andrew M. Leavitt

Tyson & Mendes LLP

Co-counsel for Defendant, CCEA

/s/ Andrew M. Leavitt

Dated this 23rd of January, 2025

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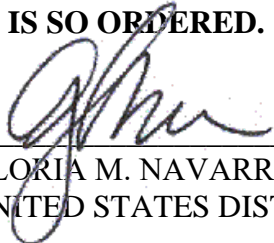
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Attorneys for Defendants CCSD, Washington

ORDER

IT IS SO ORDERED.



GLORIA M. NAVARRO

UNITED STATES DISTRICT JUDGE

Dated: January 24, 2025.